

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

2007 JAN 30 A 9:38

Robert Lee Allen

Full name and prison number  
of plaintiff(s)

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

v.

Loundes County Sheriff Dept

MR. Willie, Vaughner

Cap't Lairue, Gresham

CIVIL ACTION NO. 2:07cv85-WKW  
(To be supplied by Clerk of  
U.S. District Court)

Name of person(s) who violated  
your constitutional rights.  
(List the names of all the  
persons.)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ( ) NO (✓)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ( ) NO (✓)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county) \_\_\_\_\_

3. Docket number \_\_\_\_\_
4. Name of judge to whom case was assigned \_\_\_\_\_
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
6. Approximate date of filing lawsuit \_\_\_\_\_
7. Approximate date of disposition \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT Lowndes County Detention Facility

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Lowndes County Detention Facility

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

- |    | NAME                               | ADDRESS  |
|----|------------------------------------|--|
| 1. | <u>Lowndes County Sheriff Dept</u> | <u>Hayneville Al 36040</u>                           |
| 2. | <u>MR. Willie Vaughner</u>         | <u>653 State Hwy 21 South, Hayneville, Al, 36040</u> |
| 3. | <u>Capt Lairue Gresham</u>         | <u>653 State Hwy 21 South, Hayneville, Al, 36040</u> |
| 4. | _____                              | _____  |
| 5. | _____                              | _____  |
| 6. | _____                              | _____  |

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 8/8/06 —  
until present here it is 1/15/07

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: UnSanitary Serving of the Food unclean And  
improper Serving Carts Food serve off of Metal Baking Trays  
Cruel + Injustice Treatment

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

See Attached statements - A + B

Food trays stacked on top of other peoples food  
prior to serving inmates

GROUND TWO: Inhuman: Conj Act Policy

SUPPORTING FACTS: See Attached Statement - C

Unclean eating utensil Kept in rooms And  
Never clean

MR. Daniel W. Childrey Jr work in Kitchen As A  
Trustee he sleeps in A-5 Dorm witness About inside the  
Kitchen everybody thats lock up is A witness to everything else

GROUND THREE: See Attached - A - B

SUPPORTING FACTS: Medication Not dispense by AN R.N  
but by C.O's They was trying to give me someone's  
else's medication About the Month of 12/11/06 Not only  
me but they tried to give Timothy Allen the Same  
Medication, see Attached A-B

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.  
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Do what you normally would do in cases like this

I Am Stating the Facts, Now you Do what you Do

Appoint me An Attorney would be a nice start

Robert Allen

Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true  
and correct.

EXECUTED on 1/26/07  
(Date)

Robert Allen

Signature of plaintiff(s)

## My Complaint Facts

Since my incarceration at Lowndes County Jail on Aug. 7<sup>th</sup> 2006 Mr. Allen hasn't had his cup, spoon, or fork washed and sanitized. Not only him no inmate inmates in this facility had any of these necessary procedures done. I'm only using myself as an example of how long this hasn't been done. There are other people who I will name momentarily who also encountered these dice situations. In short the food carts which store our food prior to being served are filthy. They have old food from days past collected in the bottom of the carts. The metal trays are baking pans have stagnated water and we often find <sup>Black-</sup> grey water drops inside our food trays. When we complain about it they just change trays and give it to another inmate. Something must be done about the way that we are being treated. The trays are stacked on top of each other the bottom of one tray is sitting on top of someones food. The food is never hot from my knowledge food is supposed to be a certain temperature when served. Let me scratch the surface on a few other areas that need some attention. The medical attention that we receive here is not done in a professional manner. Medication is not administered by a R.N. they let unlicensed personnel pass out medication preferably C.O.'s. On one occasion <sup>About the morning of Dec. 11, 2006</sup> about a month prior to this Mr. Allen was called up front and asked to take some medication that was not his by C.O. Lawson. This could have been a fatal error, so they called Timothy Allen up front to take the medication, only to find out that it wasn't his either, it was some other Allen. The Captain has the nurse trained not to recommend anyone to see a physician she always has the final word in such matters, but has no medical credentials. They (Captain + Nurse) always say "why didn't you get that fixed before you came to jail?" And the only time the carts are clean, and the food is served hot is when the Night Cook comes to work, Mrs. C. Lawson is a blessing to this facility if it wasn't for her we would not get a hot meal.

Exhibit B

Blankets got wash once in 5 months

We also have to take cold showers and the water is never hot. If the water was hot we probably could sterilize our own forks and spoons cause we keep them in the cells with us. We are also being etiolated in this facility denied fresh air and sunlight. The guy who has been here the longest has only been outside twice in 6 mos. during a shake down. Upon entering this facility they don't give you crab showers and lice showers with Qwell shampoo and people are complaining about itching. No one receives a physical whenever they come to jail. They are charging us for Tylenol and Tums medications other facilities give to you free of charge, is this appropriate?

Spoiled Food Served on these Dates (11/29/06 Spoiled Potatoe Salad) (12/25/06 - Spoiled Chicken Leg Quarters) (1/21/07 Very Spoiled Butter Rice) look its still going on

I swear or Affirm that the answers are true and reflect the current status of what transpired. I understand that a false statement may subject me to penalties of perjury. I authorize the court or it's Authorized Representatives to obtain Records of information pertaining to this statement provided by the below complainants.

Sign. 1/15/07

- 1) Robert Ally
- 2) Sornell Jackson
- 3) John Dishes
- 4) Darnell Robinson
- 5) Lhenaria Grant
- 6) Martin Adams 1/22/07
- 7.





## LOWNDES COUNTY DETENTION FACILITY

### WASH SCHEDULE

MONDAY ----- 1ST SHIFT:  
WASH TOWEL, FACE TOWEL AND SHEETS

TUESDAY ----- 1ST SHIFT:  
WASH INMATE PERSONEL CLOTH (T-SHIRT, BOXER,  
BRIEFS & SOCKS)

✓ WEDNESDAY -- 1ST SHIFT:  
WASH BLANKLETS

THURSDAY ----- 2ND SHIFT:  
WASH INMATE UNIFORMS

✓ FRIDAY ----- 1ST SHIFT:  
STERILIZE AND SANITIZE INMATE CUPS